

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Western District of TexasFiled 12-7-16
Clerk, U. S. District Court
Western District of Texas
By [Signature] Deputy

United States of America)

v.)

RAYMOND SANCHEZ)

Case No.)

5:16-MJ-1172)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 5, 2016 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

Title 18 U.S.C. §922(g)(1)

Felon in possession of a Firearm

Penalty: a maximum 10 years imprisonment, \$250,000.00 fine & 3 years supervised release and a \$100 mandatory assessment fee.

This criminal complaint is based on these facts:

Please see attached affidavit

☒ Continued on the attached sheet.[Signature]
Complainant's signature

Jacob Garza, ATF TFO/SAPD Detective

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/06/2016[Signature]
*Judge's signature*City and state: San Antonio, Texas

Henry Bemporad, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Detective Jacob T. Garza, being duly sworn do hereby depose and state:

1. Your affiant is currently employed as a Detective Investigator with San Antonio Police Department (SAPD) Street Crimes Unit and has been with SAPD for approximately 16 years. Your affiant is also assigned to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) as a deputized Task Force Officer (TFO). As a SAPD Street Crimes Detective, your affiant has worked with federal and state agencies in the identification and investigation of criminal organizations. These investigations also involve weapons and controlled substance violations of state and federal laws. During the course of your affiant's employment, your affiant has personally been involved in a number of drug trafficking investigations where felons were caught in possession of firearms. With ATF, your affiant has participated in several state and federal investigations concerning persons in violation of Federal firearms laws, specifically for possession of firearms by previously convicted felons, in violation of Title 18, United States Code, Section 922(g)(1).
2. Your affiant has probable cause to believe that Raymond **SANCHEZ**, who having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce, firearms, to-wit: Beretta, Model: 950 BS, .25 caliber, Serial: BU50102V which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).
3. On December 5, 2016, a SAPD marked unit observed **SANCHEZ** at the 1600 block of N. St. Marys. **SANCHEZ** was observed walking in the roadway where a sidewalk was provided which is a traffic violation. **SANCHEZ** also attempted to cross the public roadway without using a crosswalk. The officers made contact with **SANCHEZ** and he began to make furtive movements around his waistband area. A frisk was conducted by the officers and Officer Mahula felt what he believed to be a firearm.
4. A firearm was seized by Officer Mahula and the firearm is described as Beretta, Model: 950 BS, .25 caliber, Serial: BU50102V loaded with ammunition **SANCHEZ** stated that he was sorry to Officer Mahula. **SANCHEZ** was handcuffed and searched. Approximately 1.5 grams of methamphetamine was found on **SANCHEZ**'s front left pant pocket.
5. **SANCHEZ** was transported to 555 Academic for processing and interviewing. **SANCHEZ** was advised of his Miranda Rights. **SANCHEZ** admitted ownership of the firearm that was on his possession. **SANCHEZ** also advised this affiant that he is a convicted felon and knows he is prohibited from possessing a firearm.

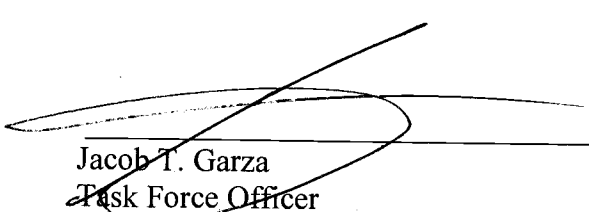
6. Your affiant confirmed that firearm was not manufactured in Texas and had therefore been shipped and transported in interstate and foreign commerce. A field test conducted on the above listed drug resulted in a positive test for methamphetamine. Your affiant confirmed that **SANCHEZ** has gang affiliation with the Orejones.

7. Your affiant confirmed that **SANCHEZ** has the following felony conviction from Bexar County, Texas:

Poss C/S PG1 –Cause number 2000CR0963B

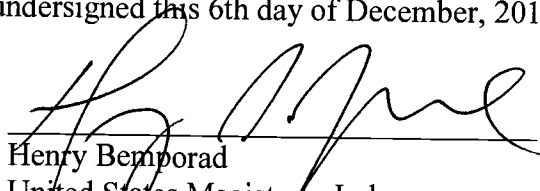
8. Your affiant also conducted research and is still investigating **SANCHEZ** for two more felony convictions in Lucas County, Ohio.

9. Based upon the above-mentioned information, I believe that **SANCHEZ** is a felon who possessed the above-described firearm in violation of Title 18, USC, Section 922(g)(1) and that a warrant should be issued for his arrest.



Jacob T. Garza
Task Force Officer
ATF

Sworn to and subscribed before the undersigned this 6th day of December, 2016 in SAN ANTONIO, TEXAS.



Henry Bemporad
United States Magistrate Judge
Western District of Texas